

FILED  
U.S. DISTRICT COURT  
**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**  
2002 SEP 11 10:42

**APRIL D. KYLE A/K/A  
APRIL HUNTER,**

**Plaintiff,**

**v.**

**ROBERT SIMS,  
ET AL.,**

**Defendants.**

**Civil Action No. MJG-02-CV-2920**

**DEFENDANT CAMERA PRESS, LIMITED'S UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME WITHIN WHICH TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b) and Local Rule 105, and with the consent of Plaintiff's counsel, Defendant Camera Press, Limited ("Camera Press") respectfully requests an enlargement of time of two weeks, up to and including September 25, 2002, within which to respond to Plaintiff's Complaint. Camera Press' response is currently due on September 11, 2002. Plaintiff's counsel has represented that Plaintiff does not oppose this motion.

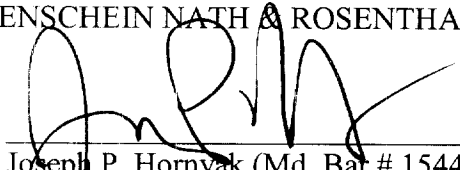
As grounds for this motion, Camera Press states that it is a United Kingdom company based in London, England. Camera Press did not have a pre-existing relationship with Maryland (or any U.S.) counsel, and only recently retained the undersigned counsel. Camera Press and its counsel are working diligently to reply to Plaintiff's Complaint as well as manage other pressing commitments, and therefore more time is needed. For the foregoing reasons, Camera Press respectfully requests that this Court grant an enlargement of time, up to and including September 25, 2002, within which to respond to Plaintiff's Complaint.

*9/29*

Respectfully submitted,

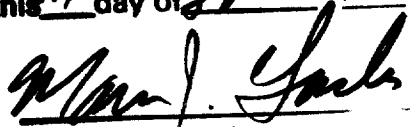
SONNENSCHEN NATH & ROSENTHAL

By:



Joseph P. Hornyak (Md. Bar # 15445)  
Renee C. Macri  
1301 K Street, N.W.  
Suite 600, East Tower  
Washington, D.C. 20005  
(202) 408-6400  
Fax: (202) 408-6399

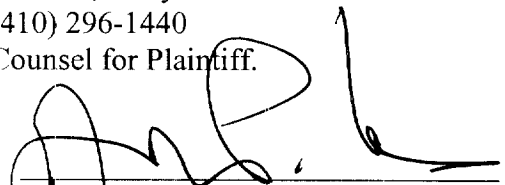
Attorneys for Defendant Camera Press, Limited

*Agreed* this 11th day of Sept, 2002  
  
**Marvin J. Garbis**  
**United States District Judge**

**CERTIFICATE OF SERVICE**

I DO HEREBY CERTIFY that on this 10<sup>th</sup> day of September, 2002, a copy of the foregoing Defendant Camera Press, Limited's Unopposed Motion for Enlargement of Time Within Which to Respond to Complaint was served by U.S. Mail on:

Dennis F. O'Brien, P.A.  
Foard, Gisriel, O'Brien, & Ward, LLC  
29 West Susquehanna Avenue  
Suite 302  
Towson, Maryland 21204  
(410) 296-1440  
Counsel for Plaintiff.

  
\_\_\_\_\_  
Counsel for Defendant Camera Press,  
Limited